



**Docket No. FAA-2011-0012 Comments**

[e-mail redacted]

LaDeana Peden

02/29/2012 10:51 AM

It is my opinion that the Trust company's should be held responsible for the operation and maintenance of the Aircraft for which they are receiving a fee to register the AC. They should have oversight and reporting responsibilities for operations and maintenance performance.

Foreign operators of US registered Aircraft are only using our system because it allows them to do so as they would not be able to do so with their own authorities. Thus enabling them to operate without either US or Foreign Authorities oversight.

As almost all of the Aircraft in Trusts are located outside the United States the FAA does not have the resources to monitor these AC. The only time the FAA gets involved is when someone operating an N reg AC has an accident or incident. The foreign authorities don't regard the N reg AC as there responsibility so essentially there is no oversight on foreign operators of American Registered Aircraft.

On the maintenance side it is the same the FAA does not have the resources to ramp check aircraft and in many cases cannot even get onto airports without permission from the airport authorities, which in many cases is not a simple process there by making any ramp checks practically impossible.

Additionally FAA regulations were never written to cover the operation or maintenance of aircraft outside the US, most foreign operators don't know our rules nor really make an effort to follow them when operating outside the US.

Name Withheld  
US FAA A&P with IA Endorsement.